REMARKS

Claims 1-4, 6-12 and 14-33 remain pending in the application. Reconsideration is respectfully requested in light of the following remarks.

Section 102(e) Rejection:

The Examiner rejected claims 1-4, 6-12 and 14-33 under 35 U.S.C. § 102(e) as being anticipated by Gwertzman et al. (U.S. Patent 6,189,000) (hereinafter "Gwertzman"). Applicant respectfully traverses this rejection for at least the reasons presented below.

Gwertzman does not disclose an identity index that comprises a virtual identity that in turn comprises <u>a plurality of information object identifiers</u> each corresponding to a respective information object, and <u>for each information object, a resource name identifying a resource</u> at which the respective information object is located, wherein the resource name <u>is associated with the respective information object identifier</u>; and wherein the identity index further comprises <u>a resource definition</u> corresponding to each respective named resource, <u>wherein the resource definition further comprises connection information</u>, as recited in claim 1.

Applicant's claimed invention pertains to a particular type of data structure, an identity index, for use in managing user information objects. One embodiment of an identity index is illustrated in Applicant's FIG. 3. The identity index includes a virtual identity (e.g., 312) and resource definitions (e.g., 360, 362 and 364). The virtual identity includes a plurality of information object identifiers (e.g., 350) each corresponding to a respective information object (e.g., 342, 344 and 346). The virtual identity also includes, for each information object, a resource name (e.g., Reso01, Reso02 (353) and Reso03) identifying a resource (210, 212 and 214) at which the respective information object is located, wherein the resource name is associated with the respective information object

identifier (e.g., JANE_D, janed (352) or JaneD). Each resource definition includes connection information (e.g., 368).

Gwertzman does not teach a data structure for an identity index as recited in claim 1. In contrast, Gwertzman teaches "a storage-mechanism interface." In Gwertzman, "instead of having to indicate a path to the storage mechanism and the actual name of the data structure, the application developer needs only to call the data structure a logical name (e.g., 'foo') and the storage-mechanism interface takes care of properly locating and identifying the storage mechanism and the data structure (i.e., providing the actual name of the data structure)." Gwertzman -- col. 6, lines 59-65. Gwertzman's storage-mechanism interface is a programmatic interface called by application developer code. Gwertzman does not teach the particular data structure of an identity index that comprises a virtual identity that in turn comprises a plurality of information object identifiers each corresponding to a respective information object, and for each information object, a resource name identifying a resource at which the respective information object is located, wherein the resource name is associated with the respective information object identifier; and wherein the identity index further comprises a resource definition corresponding to each respective named resource, wherein the resource definition further comprises connection information, as recited in claim 1.

In response to Applicant's arguments above, the Examiner, in the Response to Arguments section of the Final Action, argues that Gwertzman's database corresponds to the identity index in Applicant's claim 1. The Examiner is incorrect. In contrast, Gwertzman teaches that an entry in his database "includes a field indicating the path name to the storage mechanism associated with the logical name and the actual name of the data structure containing the desired property." Gwertzman's database entry also includes "a field containing a user identity for that storage mechanism or containing a property" (Gwertzman, column 7, lines 1-8). Thus, each entry in Gwertzman's database includes a logical name, a path name (to the storage mechanism), the actual name of the data structure, and a user identity. Each entry in Gwertzman's database, which the Examiner equates to virtual identities, contains information regarding only a single

logical name mapped to a single path name. No mention is made, either at the Examiner's cited passages or elsewhere, regarding a virtual identity that comprises *a plurality* of information object identifiers each corresponding to a respective information object.

Additionally, Gwertzman's database entries do not contain resource definitions. The Examiner cites column 8, lines 3-25 of Gwertzman and argues that TABLE 1 of Gwertzman includes connection information. However, TABLE 1 of Gwertzman illustrates information used to initialize an ObjectInfo object used as part of creating Gwertzman's storage-mechanism interface, which Gwertzman describes as a COM object. Nowhere does Gwertzman describe TABLE 1 as being part of, of as describing, the database, which the Examiner equates to an identity index. Since Gwertzman does not include connection information in resource definitions in the entries of his database, Gwertzman cannot be said to anticipate Applicant's claim 1.

Applicant reminds the Examiner that anticipation requires the presence in a single prior art reference disclosure of <u>each and every element</u> of the claimed invention, <u>arranged as in the claim</u>. M.P.E.P 2131; *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 221 USPQ 481, 485 (Fed. Cir. 1984). The <u>identical</u> invention must be shown <u>in as complete detail</u> as is contained in the claims. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The particular structure of the identity index of Applicant's claimed invention is clearly not anticipated by Gwertzman's database.

Therefore, for at lease the reasons above, the rejection of claim 1 is clearly not supported by the cited art and removal thereof is respectfully requested. Similar remarks to those above regarding claim 1 also apply to independent claims 20 and 26, as they include similar limitations to those of claim 1.

Regarding claim 2, Gwertzman fails to disclose that the resource definition further comprises a schema map. The Examiner cites column 7, lines 51-60 describing how each user object on a server contains a schema. However, the schemas of Gwertzman are not comprised in a resource definition that is part of a virtual identity that in turn is part of an identity index. The Examiner, in the rejection of claim 1 equates the database of Gwertzman with an identity index. However, the schemas cited by the Examiner are not part of Gwertzman's database. Instead, the schemas are part of each user object on a server. Additionally, Gwertzman teaches that the storage-mechanism aggregates the individual schemas into a single schema space that application developers use authoring tools to view (Gwertzman, column 7, lines 51-65). Thus, Gwertzman clearly fails to teach a resource definition comprising a schema map. As the rejection of claim 2 is not supported by the cited prior art, removal thereof is respectfully requested. Similar arguments apply to claims 10, 17, 21, 24 and 31.

Regarding claim 3, Gwertzman fails to disclose that the schema map maps a resource attribute from the resource to a virtual attribute defined by the schema map. In contrast, Gwertzman teaches the use of a schema that identifies the properties included within a user object on a server (Gwertzman, column 7, lines 51-65). For example, as Gwertzman describes, if an object includes phone numbers of users, the schema for that object may include an element stating: "phone numbers". Thus, rather than teaching a schema map that maps a resource attribute from a resource to a virtual attribute defined by the schema map, Gwertzman teaches a schema that describes what elements or properties are included in a user object. The Examiner cites column 9, lines 28-44 of Gwertzman. However, this portion of Gwertzman is not describing Gwertzman's schema. Instead, the cited passage is describing a Get Object function that "is used by an application to obtain an ADS object containing a user property." The cited passage does not even mention any sort of schema or schema map. Nor does it describe mapping a resource attribute to a virtual attributed *defined by a schema map*.

Thus, the rejection of claim 3 is not supported by the prior art and removal thereof is respectfully requested. Similar arguments apply to claims 11, 25, and 32.

Applicant also asserts that numerous ones of the dependent claims recite further distinctions over the cited art. However, since the rejection has been shown to be unsupported for the independent claims, a further discussion of the dependent claims is not necessary at this time.

CONCLUSION

Applicant submits that the application is in condition for allowance, and notice to that effect is respectfully requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-96802/RCK.

Also enclosed herewith are the following items:

☒ Return Receipt Postcard
☐ Petition for Extension of Time
☐ Notice of Change of Address
☐ Other:

Respectfully submitted,

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